

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	) <b>Case No. 20-23110-GLT</b>
Brian Keith Adams,	)
<b>Debtor,</b>	) <b>Chapter 13</b>
Brian Keith Adams,	)
<b>Movant,</b>	) <b>Related Document No. 129-130</b>
<b>vs.</b>	) <b>Hearing Date: 03/08/23 @ 10:30 a.m.</b>
Limosa, LLC and	) <b>Response Due: 02/27/23</b>
Ronda J. Winnecour, Chapter 13 Trustee,	)
<b>Respondents.</b>	) <b>Document No.</b>

**CERTIFICATION OF NO OBJECTION REGARDING  
MOTION FOR AN ORDER (I) ENFORCING THE CHAPTER 13 PLAN, (II)  
COMPELLING THE VACATION OF THE SHERIFF'S SALE, THE RETURN OF THE  
DEED TO THE DEBTOR AND THE SATISFACTION OF MORTGAGE, AND (III)  
GRANTING RELATED RELIEF  
- Document No. 129**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the **Motion for an Order (I) Enforcing the Chapter 13 Plan, (II) Compelling the Vacation of the Sheriff's Sale, the Return of the Deed to the Debtor and the Satisfaction of the Mortgage, and (III) Granting Related Relief** filed on February 9, 2023, has been received.

The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the **Motion for an Order (I) Enforcing the Chapter 13 Plan, (II) Compelling the Vacation of the Sheriff's Sale, the Return of the Deed to the Debtor and the Satisfaction of the Mortgage, and (III) Granting Related Relief** appears thereon. Pursuant to the Notice of Hearing, objections to the **Motion for an Order (I) Enforcing the Chapter 13 Plan, (II) Compelling the Vacation of the Sheriff's Sale, the Return of the Deed to the Debtor and the Satisfaction of the Mortgage, and (III) Granting Related Relief** were to be filed and served no later than February 27, 2023.

It is hereby respectfully requested that the Order attached to the **Motion for an Order (I) Enforcing the Chapter 13 Plan, (II) Compelling the Vacation of the Sheriff's Sale, the Return of the Deed to the Debtor and the Satisfaction of the Mortgage, and (III) Granting Related Relief** be entered by the Court.

**Dated:** February 28, 2023,

**BY:** /s/ Donald R. Calaiaro  
**Donald R. Calaiaro, Esquire**  
**PA I.D. No. 27538**  
[dcalaiaro@c-vlaw.com](mailto:dcalaiaro@c-vlaw.com)

**CALAIARO VALENCIK**  
**938 Penn Avenue, Suite 501**  
**Pittsburgh, PA 15222-3708**  
**(412) 232-0930**